

WANGER JONES HELSLEY PC
265 E. River Park Circle, Suite 310
Fresno, California 93720
Telephone: (559) 233-4800
Facsimile: (559) 233-9330

Peter M. Jones #105811

Attorneys for: Defendant Ebony Lambert

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

EBONY LAMBERT,

Defendant.

Case No. 1:23-CR-00102 NODJ-BAM

**STIPULATION TO ALLOW
MODIFY PRETRIAL SUPERVISION
CONDITION OF DEFENDANT'S
RELEASE NOT TO HAVE
CONTACT WITH ANY CO-
DEFENDANTS; DECLARATION OF
PETER M. JONES IN SUPPORT OF
STIPULATION; ORDER THEREON**

Defendant, EBONY LAMBERT, by and through counsel, Peter M. Jones, and Plaintiff, United States of America, by and through counsel, Stephanie Stockman, hereby stipulate as follows:

That the condition of pretrial release supervision by Pretrial Services that the defendant not have contact with any of the co-defendant's be modified to allow contact with co-defendant Donnel Mays; and that all other terms and conditions not in conflict with this order shall remain in full force and effect.

DECLARATION OF PETER M. JONES

1. I am an attorney duly licensed to practice in the State of California. I am counsel of record for Defendant, Ebony Lambert, in the above-captioned action. Except as to matters based on information and belief, I have personal knowledge of the matters set forth in

this declaration. Regarding matters stated on information and belief, I believe them to be true. If called upon as a witness to testify about the content of this Declaration, I could and would competently do so.

2. One of the conditions of Defendant's release was that she would have no contact with any of the co-defendants. On February 1, 2024, Pretrial Services Officer, Lorena Gallagher, sent an email to me, indicating that her office would not object to a modification of the condition mentioned above, allowing contact between defendant Donnell Mays (whom she supervises) and Ebony Lambert (who is being supervised by Officer Karlene Myles). The reason for her office's position is the long standing relationship between Ms. Lambert and Mr. Mays (15 years) and the fact Mr. Mays had been the primary source of support of Ms. Lambert's ongoing serious health conditions (Ms. Lambert is under the care of multiple doctors for sickle cell anemia, an enlarged heart and extremely high blood pressure). Additionally, Mr. May raised Ms. Lambert's two, now grown, sons, who consider him their father; and her older son has children who regard Mr. Mays as their grandfather. All other conditions previously imposed and not in conflict with this order would remain in full force and effect.

3. I have been in communication with AUSA, Stephanie Stockman, and she agrees to this modification of the Defendant's pretrial release conditions.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this Declaration was executed on **February 13, 2024** at Fresno California.

/s/ Peter M. Jones
Peter M. Jones

DATED: FEBRUARY 13, 2024.

RESPECTFULLY SUBMITTED,

BY: /s/ PETER M. JONES
PETER M. JONES, COUNSEL FOR
EBONY LAMBERT

1 DATED: FEBRUARY 13, 2024

PHILLIP A. TALBERT, U.S. ATTORNEY

2 By: /s/ Stephanie Stockman

3 STEPHANIE STOCKMAN,
4 ASSISTANT U.S. ATTORNEY

5 **ORDER**

6 Having reviewed the above Stipulation and Good Cause Appearing, it is hereby
7 ordered that the condition of pretrial release supervision regarding having no contact with co-
8 defendants be modified, for defendant, Ebony Lambert, to read: "You must not associate or
9 have any contact with co-defendants, unless in the presence of counsel or otherwise approved
10 in advance by the pretrial services officer; with the exception of Donnell Mays, with whom
11 you must not discuss your case." All other conditions of release not in conflict with this order
12 shall remain in full force and effect.

13 IT IS SO ORDERED.

14
15 Dated: **February 13, 2024**

/s/ Eric P. Grogan
16 UNITED STATES MAGISTRATE JUDGE
17
18
19
20
21
22
23
24
25
26
27